

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: ARLIN D. YONS

CHAPTER 13

Bky No. 15-12984

Debtor

**ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY
AND CO-DEBTOR STAY**

1. Paragraphs 1, 2, 3, 4, 5, 6, 7, and 8 are admitted.
2. Paragraphs 9, 10, 11, 12, 13, and 14 are denied.

AFFIRMATIVE DEFENSES

3. There is no cause including the lack of adequate protection for granting the relief requested.
4. According to the movant's statements, the mortgage payments are \$1,089.58 per month, which is the amount the Debtor has been paying.
5. The Debtor is only two months in arrears, which he will bring current.
6. The property is necessary to an effective reorganization.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the Motion.

Respectfully Submitted,

/s/ Jon M. Adelstein

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